

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

UNITED STATES OF AMERICA and))
STATE OF WISCONSIN,))
)
Plaintiffs,))
)
v.)	No. 10-C-910
)
NCR CORP. and APPLETON PAPERS))
INC., <i>et al.</i> ,))
)
Defendants.))

**DECLARATION OF FRANCIS A. CITERA IN SUPPORT OF
DEFENDANT P.H. GLATFELTER COMPANY'S RESPONSE TO
DEFENDANT NCR CORPORATIONS' MOTION *IN LIMINE* TO
EXCLUDE THE EXPERT TESTIMONY OF GARY KLEINRICHERT**

I, Francis A. Citera, declare:

1. I am a Shareholder with the law firm of Greenberg Traurig, LLP. I am duly admitted to practice before the United States District Court for the Eastern District of Wisconsin. I am one of the attorneys representing P.H. Glatfelter Company ("Glatfelter") in the above-captioned case. The following facts are within my personal knowledge and, if called as a witness, I could and would testify competently thereto.

2. Glatfelter and certain other defendants have designated Gary Kleinrichert as an expert witness for the December 3, 2012 trial of the above-captioned case.

3. A true and correct copy of Mr. Kleinrichert's initial expert report is attached as

Exhibit 1.

4. A true and correct copy of Mr. Kleinrichert's supplemental expert report is attached as **Exhibit 2.**

5. A true and correct copy of the transcript of Mr. Kleinrichert's deposition is attached as **Exhibit 3**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on November 27, 2012, in Chicago, Illinois.

Dated: November 27, 2012

By: /s/ Francis A. Citera
Francis A. Citera
David G. Mandelbaum
Marc E. Davies
Caleb J. Holmes
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**Attorneys for Defendant P. H. Glatfelter
Company**

CERTIFICATE OF SERVICE

I, Francis A. Citera, do hereby certify that on this 27th day of November, 2012, I caused a copy of **DECLARATION OF FRANCIS A. CITERA IN SUPPORT OF DEFENDANT P.H. GLATFELTER COMPANY'S RESPONSE TO DEFENDANT NCR CORPORATIONS' MOTION IN LIMINE TO EXCLUDE THE EXPERT TESTIMONY OF GARY KLEINRICHERT** to be filed electronically via the Electronic Court Filing system and is available for viewing and downloading:

/s/ Francis A. Citera

Francis A. Citera